United States District Court

United States of America

V.

Gregory Pruitt; DOB: 1995; United States Christian Robert Lee Cassidy; DOB: 1994; United States

DISTRICT of ARIZONA
DOCKET NO.
MAGISTRATE'S CASENO.

Complaint for violation of Title 8, United States Code §§ 1324(a)(1)(A)(ii) & 1324(a)(1)(B)(i); 1325; 18 USC § 2

COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

COUNT 1 (Felony) On or about July 11, 2019 at or near Sierra Vista, in the District of Arizona, Gregory Pruitt, knowing or in reckless disregard that certain aliens, namely Virk Sukhject-Singh, Gajandeep Singh, and Deepak Deepak, had come to, entered, and remained in the United States in violation of law, did transport said aliens within the United States by means of transportation and otherwise, in furtherance of such violation of law and did so for the purpose of private financial gain; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).

COUNT 2 (Misdemeanor) On or about July 11, 2019 at or near Sierra Vista, in the District of Arizona, Gregory Pruitt, did unlawfully aid and abet certain illegal aliens, namely Virk Sukhject-Singh, Gajandeep Singh, and Deepak Deepak, to elude examination and inspection by Immigration Officers of the United States of America; in violation of Title 8, United States Code, Section 1325 and Title 18, United States Code, Section 2.

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On or about July 11, 2019 at or near Sierra Vista, in the District of Arizona, United States Border Patrol Agents (BPA) were called to assist Cochise County Sheriff's Office (CCSO) deputies during a traffic stop. CCSO deputies pulled over a grey 2016 Ford Fusion because their headlights were not on. Deputies observed five people in the vehicle. The driver was identified as **Gregory Pruitt**, and the front seat passenger as **Christian Robert Lee Cassidy**. When BPA arrived, they questioned the three passengers in the backseat, namely Virk Sukhject-Singh, Gajandeep Singh, and Deepak Deepak, and determined they were all citizens of India, in the United States illegally. **Cassidy** told the CCSO Deputy that he did not know the people in the backseat, but that they were paid to give them a ride.

Material witnesses, Virk Sukhject-Singh, Gajandeep Singh, and Deepak Deepak, stated their families had made arrangements for them to be smuggled into the United States for money. The material witnesses stated that after crossing into the United States illegally, they were guided to a location where they got into a vehicle, and were taken to a hotel room. Sukhject-Singh stated the driver and passenger gave them food and water at the hotel, before continuing their trip further north.

In a post-*Miranda* statement, **Pruitt** stated that while traveling to Sierra Vista together, **Cassidy** approached **Pruitt** about giving the material witnesses a ride to Phoenix, and that they would be paid a couple hundred dollars. **Pruitt** and **Cassidy** rented a hotel room with the material witnesses, and provided them with food. **Pruitt** stated when they left to continue their drive to Phoenix, **Cassidy** asked **Pruitt** to drive, and **Cassidy** put the route in his GPS for **Pruitt** to follow.

MATERIAL WITNESSES IN RELATION TO THE CHARGE: Virk Sukhject-Singh, Gajandeep Singh, and Deepak Deepak

DETENTION REQUESTED
COMPLAINT REVIEWED by AUSA CHR/lmw

Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.

Sworn to before me and subscribed in my presence.

SIGNATURE OF MAGISTRATE JUDGS:

DATE
July 15, 2019